

**IN THE UNITED STATES PATENT & TRADEMARK OFFICE**

In re Chen ) Serial No.: 10/617,526  
              )  
Applicant,   ) Docket No.: AUS920030523US1  
              )  
For: Traditional Chinese / Simplified Chinese ) Art Unit: 2626  
Character Translator                              )  
              )  
              ) Confirmation No.: 3551  
              )  
Filed: July 10, 2003                              ) Examiner: Neway

**APPEAL BRIEF**

March 17, 2008

Ms Appeal Brief – Patents  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

As required, this brief is filed within two months from of the Notice of Appeal,  
filed on January 17, 2008.

The fees required under § 41.20(b)(23) are dealt with in the accompanying  
TRANSMITTAL OF APPEAL BRIEF.

This brief contains items under the following headings as required by 37 C.F.R. §  
41.37 and M.P.E.P. § 1205.2:

- I.           Real Party In Interest
- II.          Related Appeals and Interferences
- III.         Status of Claims
- IV.         Status of Amendments
- V.          Summary of Claimed Subject Matter
- VI.         Grounds of Rejection to be Reviewed on Appeal
- VII.        Argument
- VIII.       Claims Appendix

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Appendix B	Evidence
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### I. Real Party In Interest

The real party in interest for this appeal is:

INTERNATIONAL BUSINESS MACHINES CORPORATION.

### II. Related Appeals and Interferences

This Appeal is related to Applications No. 10/617,530 and 10/631,070, which are being concurrently appealed.

### III. Status of Claims

#### A. Total number of Claims in Application

There are 50 claims pending in this Application.

#### B. Current Status of Claims

1. Claims canceled: 8, 16, 23, 29, 37, 45, 52, and 58

2. Claims withdrawn from consideration but not canceled: None

3. Claims pending: 1-7, 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and

53-57

4. Claims allowed: None

5. Claims rejected: 1-7, 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and

53-57

#### C. Claims on Appeal

The claims on appeal are claims 1-7, 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57.

#### **IV. Status of Amendments**

Appellant did not file an Amendment after the Rejection dated October 17, 2007.

The claims stand as written in the Amendment filed July 16, 2007.

#### **V. Summary of Claimed Subject Matter**

The following provides a concise explanation of the subject matter defined in each of the separately argued claims involved in the Appeal as required by 37 C.F.R. § 41.37l(1)(v). The features are identified by corresponding references to the specification and drawings where applicable. It should be noted that the citations to passages in the specification and drawings for each feature do not imply that the limitations from the specification and drawings should be read into the corresponding claim element. Rather, this summary is provided for the convenience of the Board.

Embodiments of the invention according to claim 1 provide a computer implemented method comprising:

using a computer having a display and connected to the Internet, copying (FIG. 3, element 204; Specification 11:22-13:4 and 12:10-13:4) a Simplified Chinese character into an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

using Unicode (FIG. 3, element 206; Specification 8:22-9:16) to determine a Traditional Chinese character equivalent (FIG. 3, element 214; Specification 9:17-10:13) of the Simplified Chinese character (*see e.g.*, FIG. 3, element 212; Specification 9:17-10:5);

using Unicode to translate (FIG. 3, element 214; Specification 9:17-10:13) the Simplified Chinese character into an accented Pin Yin word and an English word; and responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word (Spec. 7:15-16), a hybrid Pin Yin (Spec. 7:12-14) word, and an English word.

Embodiments of the invention according to claim 9 provide a computer implemented method comprising:

using a computer having a display and connected to the Internet, copying (FIG. 3, element 204; Specification 11:22-13:4 and 12:10-13:4) a Traditional Chinese character into an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

using Unicode (FIG. 3, element 206; Specification 8:22-9:16) to determine a Simplified Chinese character equivalent (FIG. 3, element 218; Specification 10:14-23) of the Traditional Chinese character (*see e.g.*, FIG. 3, element 216; Specification 10:14-23); and

using Unicode to translate (FIG. 3, element 218; Specification 10:14-23) the Traditional Chinese character into accented Pin Yin word and an English word;

responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the Traditional Chinese character as a

Simplified Chinese character, an unaccented Pin Yin (Spec. 7:15-16) word, a hybrid Pin Yin (Spec. 7:12-14) word, and an English word.

Embodiments of the invention according to claim 17 provide a computer implemented method comprising:

using a computer having a display and connected to the Internet, entering (FIG. 3, element 204; Specification 11:22-13:4 and 12:10-13:4) a Pin Yin word into an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

using Unicode to translate (FIG. 3, element 222; Specification 11:1-7) the Pin Yin word into a Traditional Chinese character, a Simplified Chinese character, and an English word;

responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin (Spec. 7:15-16) word, a hybrid Pin Yin (Spec. 7:12-14) word, and an English word.

Embodiments of the invention according to claim 24 provide a computer implemented method comprising:

using a computer having a display and connected to the Internet, entering (FIG. 3, element 204; Specification 11:22-13:4 and 12:10-13:4) an English word into an input

field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

using Unicode to translate (FIG. 3, element 226; Specification 11:8-14) the English word into a Traditional Chinese character, a Simplified Chinese character, and an accented Pin Yin (Spec. 7:15-16) word;

responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the term as a Traditional Chinese character, an unaccented Pin Yin word (Spec. 7:15-16), a hybrid Pin Yin word (Spec. 7:12-14), and an English word.

## **VI. Grounds of Rejection to be Reviewed on Appeal**

The rejection of claims 1-7, 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57 on the ground of nonstatutory obviousness-type double patenting over claims 1-30 of copending Application No. 10/617,530 (the ‘530 Application) in view of <http://web.archive.org/web/20001204034200/http://www.mandarintools.com/cintro.html> (hereinafter, the Mandarintools Web Page) and <http://web.archive.org/web/20001204034200/http://www.mandarintools.com/worddict.html> (hereinafter, the Chinese-English Dictionary Web Page) (collectively, the Mandarintools Web Pages). Office Action pp. 2-5.

The rejection of claims 1-3, 9-11, 17, 24, 30-32, 38-40, 46, and 53 on the ground of nonstatutory obviousness-type double patenting over claims 1, 5-7, 26, and 30-32 of copending Application No. 10/631,070 (the ‘070 Application) in view of the

Mandarintools Web Pages. Office Action pp. 5-6. Appellant notes the rejection states “claims 1-3, 8-11, 16-17, 23-24, 29-32, 37-40, 45-46, 52-53, and 58” are rejected, but that claims 8, 16, 23, 29, 37, 45, 52, and 58 are canceled. Thus, Appellant interprets this rejection as applying to claims 1-3, 9-11, 17, 24, 30-32, 38-40, 46, and 53.

The rejection of claims 1-4, 6-7, 9-12, 14-15, 17-20, 22, 24-26, 28, 30-33, 35-36, 38-41, 43-44, 46-49, 51, 53-55, and 57 under 35 U.S.C. 103(a) over the Mandarintools Web Pages in view of <http://web.archive.org/web/20010309104519/http://home.iprimus.com.au/richwarm/cel/cel.htm> (hereinafter, the CEL Web Page) and <http://web.archive.org/web/20021206035901/http://www.foolsworkshop.com/ptou/> (hereinafter, the Foolsworkshop Web Page). Office Action pp. 7-10.

The rejection of claims 5, 13, 21, 27, 34, 42, 50, and 56 under 35 U.S.C. 103(a) over the Mandarintools Web Pages in view of the Foolsworkshop Web Page and Hughes “IICT3 COMPUTER SCIENCE SAMPLE PAPER I” (*available at [https://www.cs.tcd.ie/courses/baict/bacs/jf/EXAMINATION\\_PAPERS/SampleExamOne.pdf](https://www.cs.tcd.ie/courses/baict/bacs/jf/EXAMINATION_PAPERS/SampleExamOne.pdf)*). Office Action pp. 10-11.

## VII. Argument

### A. First Ground of Rejection

Claims 1-7, 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57 on the ground of nonstatutory obviousness-type double patenting over claims 1-30 of copending Application No. 10/617,530 (the ‘530 Application) in view of the Mandarintools Web Pages. Office Action pp. 2-5.

The analysis employed in an obviousness-type double patenting rejection parallels the guidelines for analysis of a 35 U.S.C. 103 obviousness determination. *In re Braat*, 937 F.2d 589, 19 USPQ2d 1289 (Fed. Cir. 1991); *In re Longi*, 759 F.2d 887, 225 USPQ 645 (Fed. Cir. 1985). Thus, the factual inquiries set forth in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966), are employed when making an obvious-type double patenting analysis and would require determining the differences between the scope and content of the patent claim as determined in (A) and the claim in the application at issue. See M.P.E.P. 804 II. B. 1. In determining the differences between the prior art and the claims in an obviousness analysis, the question under 35 U.S.C. 103 is whether the claimed invention as a whole would have been obvious. *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983); *Schenck v. Nortron Corp.*, 713 F.2d 782, 218 USPQ 698 (Fed. Cir. 1983). Distilling an invention down to the “gist” or “thrust” of an invention disregards the requirement of analyzing the subject matter “as a whole.” *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984).

### **Claims 1-7**

The rejection is improper for at least three reasons. First, the Instant Application recites “to translate … into accented Pin Yin word” and “displaying … an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word” yet the ‘530 Application fails to recite any similar features or limitations. The Examiner alleges the Chinese-English Dictionary Web Page remedies this deficiency. Office Action p.4. The combination fails to teach these limitations because the Chinese-English Dictionary Web Page is silent to displaying “an unaccented Pin Yin word” and “a hybrid Pin Yin word,” as set forth in the

claim. The Chinese-English Dictionary Web Page teaches “[r]esults will show the Chinese word, the pinyin representation of the word, and the English definition, yet is silent to “an unaccented Pin Yin word” and “a hybrid Pin Yin word.” Hence, at best, the Chinese-English Dictionary Web Page’s “pinyin representation” would meet one of the claim’s “unaccented Pin Yin word” or “hybrid Pin Yin word,” but not a “unaccented Pin Yin word” and a “hybrid Pin Yin word.” Furthermore, though the Chinese-English Dictionary Web Page teaches results shown in a “pinyin representation,” the Chinese-English Dictionary Web Page is silent to results shown in an “unaccented” pinyin representation and is also silent to results shown in a “hybrid” pinyin representation. Hence, claim 1 comprises features and limitations that are outside the scope of the ‘530 Application’s claim 1 in view of the Mandarintools Web Pages.

Second, neither the Instant Application’s claim 1 nor the ‘530 Application’s claim 1 dominate because each Applications’ claim 1 comprises features and limitations that are outside the scope of the other application. The Examiner alleges the Instant Application’s claim 1 in view of the Mandarintools Web Pages teaches the limitations of the ‘530 Application’s claim 1. Office Action pp. 2-5. The ‘530 Application’s claim 1 recites “recognizing the Simplified Chinese character without regard to an encoding format of the Simplified Chinese character,” yet the Instant Application’s claim 1 fails to recite any similar features or limitations. The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. As discussed above, claim 1 comprises features and limitations that are outside the scope of the ‘530 Application’s claim 1 in view of the Mandarintools Web Pages. Hence, the Instant Application’s claim 1

comprises features and limitations that are outside the scope of and ‘530 Application’s claim 1, and vice versa.

Third, the Examiner fails to analyze the subject matter as a whole because the Examiner distills the invention down to a gist or thrust. Specifically, the Examiner distills the Instant Application’s invention to “finding the corresponding equivalent Chinese Character … , the corresponding Pin Yin word, and/or an English word to any given word” and the ‘530 Application’s invention to “finding the corresponding Chinese character … to a given Chinese word.” Office Action p.4. Appellant respectfully notes the claims of the Instant Application and of the ‘530 Application contain many more features and limitations than what the Examiner’s stated gists of the invention comprise. Hence, the reasoning is improper because the Examiner did not consider all the features and limitations of the claims as a whole.

Thus, the Instant Application comprises features and limitations that are outside the scope of the ‘530 Application and the Examiner’s reasoning was improper. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 2-7 each depend from and inherit all the limitations of claim 1. As discussed above, claim 1 comprises features and limitations that are outside the scope of the ‘530 Applicant in view of the Mandarintools Web Pages and the reasoning for the rejection is improper. Thus, claims 2-7 comprise features and limitations that are outside the scope of the ‘530 Applicant in view of the Mandarintools Web Pages and the reasoning for the rejection is improper. Therefore Appellant respectfully requests that the rejection be reversed.

**Claims 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57**

Any obviousness-type double patenting rejection should make clear the reasons why a person of ordinary skill in the art would conclude that the invention defined in the claim at issue would have been an obvious variation of the invention defined in a claim in the patent. M.P.E.P. 804 II. B. 1. The Examiner provides no reasoning to support the rejection of claims 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57. *See* Office Action pp. 2-5. Rather, the Examiner merely lists claim 1 and its dependent claims in the reasoning supporting the rejection. Thus, the Examiner did not make clear the reasons why the ‘530 Application’s claims would have been an obvious variation of the Instant Application’s claims 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57. Therefore, Appellant respectfully requests that the rejection be reversed.

#### **B. Second Ground of Rejection**

Claims 1-3, 9-11, 17, 24, 30-32, 38-40, 46, and 53 stand rejected on the ground of nonstatutory obviousness-type double patenting over claims 1, 5-7, 26, and 30-32 of copending Application No. 10/631,070 (the ‘070 Application) in view of the Mandarintools Web Pages. Office Action pp. 5-6. Appellant notes the rejection states “claims 1-3, 8-11, 16-17, 23-24, 29-32, 37-40, 45-46, 52-53, and 58” are rejected, but that claims 8, 16, 23, 29, 37, 45, 52, and 58 are canceled. Thus, Appellant interprets this rejection as applying to claims 1-3, 9-11, 17, 24, 30-32, 38-40, 46, and 53.

#### **Claims 1-3 and 8**

The rejection is improper for at least three reasons. First, the reasoning provided by the Examiner is improper. The Examiner’s reasoning merely states the conflicting claims “are not patentably distinct from each other because the above-mentioned claims of copending Application No. 10/617,526 anticipate the claims of the current

Application.” Appellant respectfully notes the “current Application” is Application No. 10/617,526. Hence, the Examiner is stating that the claims of the Instant Application anticipate the claims of the Instant Application, which is clearly improper.

Second, the Instant Application’s claim 1 comprises features and limitations that are outside the scope of the ‘070 Application’s claim 1. The Examiner alleges the ‘070 Application’s claim 1 in view of the Mandarintools Web Pages teaches the limitations of the Instant Application’s claim 1. Office Action pp. 5-6. The Instant Application’s claim 1 recites “displaying … an unaccented Pin Yin word, [and] a hybrid Pin Yin word,” yet the ‘070 Application’s claim 1 fails to recite any similar features or limitations. The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, claim 1 comprises features and limitations that are outside the scope of the ‘070 Application’s claim 1 in view of the Mandarintools Web Pages.

Third, neither the Instant Application’s claim 1 nor the ‘070 Application’s claim 1 dominate because each Applications’ claim 1 comprises features and limitations that are outside the scope of the other application. The ‘070 Application recites “determining if the user input is an entire desired word, a beginning of the entire word, or whether the user input appears anywhere in the desired word” and “searching a dictionary for an entry containing a Simplified Chinese word,” yet the Instant Application fails to recite any similar features or limitations. The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. As discussed above, claim 1 comprises features and limitations that are outside the scope of the ‘570 Application’s claim 1 in view of the Mandarintools Web Pages. Hence, the Instant Application’s claim 1 comprises features

and limitations that are outside the scope of and '570 Application's claim 1, and vice versa.

Thus, the Instant Application comprises features and limitations that are outside the scope of the '070 Application and the Examiner's reasoning was improper. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 2-3 and 8 each depend from and inherit all the limitations of claim 1. As discussed above, claim 1 comprises features and limitations that are outside the scope of the '070 Applicant in view of the Mandarintools Web Pages and the reasoning for the rejection is improper. Thus, claims 2-3 and 8 comprise features and limitations that are outside the scope of the '070 Applicant in view of the Mandarintools Web Pages and the reasoning for the rejection is improper. Therefore Appellant respectfully requests that the rejection be reversed.

**Claims 9-11, 17, 24, 30-32, 38-40, 46, and 53**

Any obviousness-type double patenting rejection should make clear the reasons why a person of ordinary skill in the art would conclude that the invention defined in the claim at issue would have been an obvious variation of the invention defined in a claim in the patent. M.P.E.P. 804 II. B. 1. The Examiner provides no reasoning to support the rejection of claims 9-11, 17, 24, 30-32, 38-40, 46, and 53. *See* Office Action pp. 2-5. Rather, the Examiner merely lists claim 1 and its dependent claims in the reasoning supporting the rejection. Thus, the Examiner did not make clear the reasons why the '070 Application's claims would have been an obvious variation of the Instant Application's claims 9-11, 17, 24, 30-32, 38-40, 46, and 53. Therefore, Appellant respectfully requests that the rejection be reversed.

### C. Third Ground of Rejection

The rejection of claims 1-4, 6-7, 9-12, 14-15, 17-20, 22, 24-26, 28, 30-33, 35-36, 38-41, 43-44, 46-49, 51, 53-55, and 57 under 35 U.S.C. 103(a) over the Mandarintools Web Pages in view of the CEL Web Page and the Foolsworkshop Web Page. Office Action pp. 7-10. In rejecting claims under 35 U.S.C. § 103, it is incumbent upon the Examiner to establish a factual basis to support the legal conclusion of obviousness. *See In re Fine*, 837 F.2d 1071, 1073, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). In so doing, the Examiner must make the factual determinations set forth in *Graham v. John Deere Co.*, 383 U.S. 1, 17, 148 USPQ 459, 467 (1966), *viz.*, (1) the scope and content of the prior art; (2) the differences between the prior art and the claims at issue; and (3) the level of ordinary skill in the art. “[T]he examiner bears the initial burden, on review of the prior art or on any other ground, of presenting a *prima facie* case of unpatentability.” *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). Furthermore, “there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness’ . . . . [H]owever, the analysis need not seek out precise teachings directed to the specific subject matter of the challenged claim, for a court can take account of the inferences and creative steps that a person of ordinary skill in the art would employ.” *KSR Int'l Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1741, 82 USPQ2d 1385, 1396 (2007) (quoting *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006)). Obviousness is then determined on the basis of the evidence as a whole and the relative persuasiveness of the arguments. *See Oetiker*, 977 F.2d at 1445, 24 USPQ2d at 1444; *Piasecki*, 745 F.2d at 1472, 223 USPQ at 788.

### Claims 1-4 and 6-7

Claim 1 recites “copying a Simplified Chinese character into an input field of a graphical user interface.” The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.7. The combination fails to teach these limitations because the CEL Web Page fails to teach “into an input field,” as set forth in the claim. The Examiner interprets the CEL Web Page’s depiction of a “Search” menu item (CEL Web Page, p.1, in the window titled “Charlotte’s Web - Notepad”) as meeting the claim’s “input field” (Office Action p.7), yet the CEL Web Page is silent to copying a Simplified Chinese character into its Search menu item. Furthermore, the CEL Web Page teaches “the user has selected and copied a word” and that the CEL Web Page’s system “detect[s] the word on the Windows Clipboard” (the CEL Web Page p.1, para. 2.), yet the CEL Web Page is silent to a user pasting a word to an input field from the Windows Clipboard. The CEL Web Page’s copying to the Windows Clipboard does not meet the claim’s “copying ... into an input field” at least because the Windows Clipboard is not an “input field,” as set forth in the claim. Hence, the combination fails to teach the limitations of the claim.

Claim 1 also recites “simultaneously displaying the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.” The Examiner admits the Mandarintools Web Pages fails to teach these limitations and alleges the CEL Web Page teaches these limitations. Office Action pp. 8. The CEL Web Page fails to teach these limitations because the CEL Web Page at best teaches displaying a Traditional Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, and an English word. The CEL Web Page teaches selecting the Traditional Chinese word “斧頭” (the two characters selected in the

window titled “Charlotte’s Web – Notepad”) and displaying that same word with Pin Yin and English translations (the window titled “CEL (Chinese/English Lookup) ...”). However, the Chinese characters in the window titled “CEL (Chinese/English Lookup) ...” are the same as the selected Chinese characters in the window titled “Charlotte’s Web – Notepad.” In other words, the word selected is a Traditional Chinese character, not a Simplified Chinese character, as set forth in the claim. Also, the CEL Web Page merely teaches displaying one form of Pin Yin (“fu3” for the first Traditional Chinese character (斧) and “tou2” for the second Traditional Chinese character (頭)), whereas the claim recites “an unaccented Pin Yin word” and “a hybrid Pin Yin word.” The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach “simultaneously displaying the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.”

Claim 1 also recites “responsive to a user activation of a single control ... displaying.” The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.8. The CEL Web Page fails to teach these limitations because the CEL Web Page is silent to any form of control and because detecting a word on the Windows Clipboard does not meet the claim’s “activation of a single control.” The CEL Web Page teaches “CEL, having detected the word on the Windows Clipboard, has popped up to display,” yet is silent to responding to activating a control to pop up its display, much less any form of control. In other words, the CEL Web Page teaches, at best, displaying in response to detecting a word on the Windows Clipboard, yet is silent to “responsive to a user activation of a single control ... displaying,” because detecting a word on the

Windows Clipboard does not meet the claim's "activation of a single control." The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach "responsive to a user activation of a single control ... displaying."

Thus, the claim comprises features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 2-4 and 6-7 each depend from and inherit all the limitations of claim 1. As discussed above, claim 1 comprises features and limitations that are outside the scope of the combination of cited art. Thus, claims 2-4 and 6-7 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

#### **Claims 9-12 and 14-15**

Claim 9 recites "copying a Traditional Chinese character into an input field of a graphical user interface." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The combination fails to teach these limitations because the CEL Web Page fails to teach "into an input field," as set forth in the claim. The Examiner interprets the CEL Web Page's depiction of a "Search" menu item (CEL Web Page, p.1, in the window titled "Charlotte's Web - Notepad") as meeting the claim's "input field" (Office Action p.10 (referring to the reasoning used to reject claim 1)), yet the CEL Web Page is silent to copying a Traditional Chinese character into its Search menu item. Furthermore, the CEL Web Page teaches "the user has selected and copied a word" and that the CEL Web

Page's system "detect[s] the word on the Windows Clipboard" (the CEL Web Page p.1, para. 2.), yet the CEL Web Page is silent to a user pasting a word to an input field from the Windows Clipboard. The CEL Web Page's copying to the Windows Clipboard does not meet the claim's "copying ... into an input field" at least because the Windows Clipboard is not an "input field," as set forth in the claim. Hence, the combination fails to teach the limitations of the claim.

Claim 9 also recites "simultaneously displaying the Traditional Chinese character as a Simplified Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word." The Examiner admits the Mandarintools Web Pages fails to teach these limitations and alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page at best teaches displaying a Traditional Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, and an English word. The CEL Web Page teaches selecting the Traditional Chinese word "斧頭" (the two characters selected in the window titled "Charlotte's Web – Notepad") and displaying that same word with Pin Yin and English translations (the window titled "CEL (Chinese/English Lookup) ..."). However, the Chinese characters in the window titled "CEL (Chinese/English Lookup) ..." are the same as the selected Chinese characters in the window titled "Charlotte's Web – Notepad." In other words, the word selected is displayed as a Traditional Chinese character, not a Simplified Chinese character, as set forth in the claim. Also, the CEL Web Page merely teaches displaying one form of Pin Yin ("fu3" for the first Traditional Chinese character (斧) and "tou2" for

the second Traditional Chinese character (頭)), whereas the claim recites “an unaccented Pin Yin word” and “a hybrid Pin Yin word.” The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach “simultaneously displaying the Traditional Chinese character as a Simplified Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.”

Claim 9 also recites “responsive to a user activation of a single control ... displaying.” The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page is silent to any form of control and because detecting a word on the Windows Clipboard does not meet the claim’s “activation of a single control.” The CEL Web Page teaches “CEL, having detected the word on the Windows Clipboard, has popped up to display,” yet is silent to responding to activating a control to pop up its display, much less any form of control. In other words, the CEL Web Page teaches, at best, displaying in response to detecting a word on the Windows Clipboard, yet is silent to “responsive to a user activation of a single control ... displaying,” because detecting a word on the Windows Clipboard does not meet the claim’s “activation of a single control.” The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach “responsive to a user activation of a single control ... displaying.”

Thus, the claim comprises features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 10-12 and 14-15 each depend from and inherit all the limitations of claim 9. As discussed above, claim 9 comprises features and limitations that are outside the scope of the combination of cited art. Thus, claims 10-12 and 14-15 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

**Claims 17-20 and 22**

Claim 17 recites “entering a Pin Yin word into an input field of a graphical user interface.” The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The combination fails to teach these limitations because the CEL Web Page fails to teach “into an input field,” as set forth in the claim. The Examiner interprets the CEL Web Page’s depiction of a “Search” menu item (CEL Web Page, p.1, in the window titled “Charlotte’s Web - Notepad”) as meeting the claim’s “input field” (Office Action p.7), yet the CEL Web Page is silent to copying a Pin Yin word into its Search menu item. Furthermore, the CEL Web Page teaches “the user has selected and copied a word” and that the CEL Web Page’s system “detect[s] the word on the Windows Clipboard” (the CEL Web Page p.1, para. 2.), yet the CEL Web Page is silent to a user pasting a word to an input field from the Windows Clipboard. The CEL Web Page’s copying to the Windows Clipboard does not meet the claim’s “copying … into an input field” at least because the Windows Clipboard is not an “input field,” as set forth in the claim. Hence, the combination fails to teach the limitations of the claim.

Claim 17 also recites “simultaneously displaying the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and

an English word.” The Examiner admits the Mandarintools Web Pages fails to teach these limitations and alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page at best teaches displaying a Traditional Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, and an English word. The CEL Web Page teaches selecting the Traditional Chinese word “斧頭” (the two characters selected in the window titled “Charlotte’s Web – Notepad”) and displaying that same word with Pin Yin and English translations (the window titled “CEL (Chinese/English Lookup) …”). However, the Chinese characters in the window titled “CEL (Chinese/English Lookup) …” are the same as the selected Chinese characters in the window titled “Charlotte’s Web – Notepad.” In other words, the word selected is a Traditional Chinese character, not a Pin Yin word, as set forth in the claim. Also, the CEL Web Page merely teaches displaying one form of Pin Yin (“fu3” for the first Traditional Chinese character (斧) and “tou2” for the second Traditional Chinese character (頭)), whereas the claim recites “an unaccented Pin Yin word” and “a hybrid Pin Yin word.” The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach “simultaneously displaying the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.”

Claim 17 also recites “responsive to a user activation of a single control … displaying.” The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails

to teach these limitations because the CEL Web Page is silent to any form of control and because detecting a word on the Windows Clipboard does not meet the claim's "activation of a single control." The CEL Web Page teaches "CEL, having detected the word on the Windows Clipboard, has popped up to display," yet is silent to responding to activating a control to pop up its display, much less any form of control. In other words, the CEL Web Page teaches, at best, displaying in response to detecting a word on the Windows Clipboard, yet is silent to "responsive to a user activation of a single control ... displaying," because detecting a word on the Windows Clipboard does not meet the claim's "activation of a single control." The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach "responsive to a user activation of a single control ... displaying."

Thus, the claim comprises features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 18-20 and 22 each depend from and inherit all the limitations of claim 17. As discussed above, claim 17 comprises features and limitations that are outside the scope of the combination of cited art. Thus, claims 18-20 and 22 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

#### **Claims 24-26 and 30**

Claim 24 recites "entering an English word into an input field of a graphical user interface." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The combination fails to

teach these limitations because the CEL Web Page fails to teach “into an input field,” as set forth in the claim. The Examiner interprets the CEL Web Page’s depiction of a “Search” menu item (CEL Web Page, p.1, in the window titled “Charlotte’s Web – Notepad”) as meeting the claim’s “input field” (Office Action p.7), yet the CEL Web Page is silent to copying an English word into its Search menu item. Furthermore, the CEL Web Page teaches “the user has selected and copied a word” and that the CEL Web Page’s system “detect[s] the word on the Windows Clipboard” (the CEL Web Page p.1, para. 2.), yet the CEL Web Page is silent to a user pasting a word to an input field from the Windows Clipboard. The CEL Web Page’s copying to the Windows Clipboard does not meet the claim’s “copying … into an input field” at least because the Windows Clipboard is not an “input field,” as set forth in the claim. Hence, the combination fails to teach the limitations of the claim.

Claim 24 also recites “simultaneously displaying the term as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.” The Examiner admits the Mandarintools Web Pages fails to teach these limitations and alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page at best teaches displaying a Traditional Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, and an English word. The CEL Web Page teaches selecting the Traditional Chinese word “斧頭” (the two characters selected in the window titled “Charlotte’s Web – Notepad”) and displaying that same word with Pin Yin and English translations (the window titled “CEL (Chinese/English Lookup) …”). However, the Chinese characters in the window

titled “CEL (Chinese/English Lookup) ...” are the same as the selected Chinese characters in the window titled “Charlotte’s Web – Notepad.” In other words, the word selected is a Traditional Chinese character, not an English word, as set forth in the claim. Also, the CEL Web Page merely teaches displaying one form of Pin Yin (“fu3” for the first Traditional Chinese character (斧) and “tou2” for the second Traditional Chinese character (頭)), whereas the claim recites “an unaccented Pin Yin word” and “a hybrid Pin Yin word.” The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach “simultaneously displaying the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.”

Claim 24 also recites “responsive to a user activation of a single control ... displaying.” The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page is silent to any form of control and because detecting a word on the Windows Clipboard does not meet the claim’s “activation of a single control.” The CEL Web Page teaches “CEL, having detected the word on the Windows Clipboard, has popped up to display,” yet is silent to responding to activating a control to pop up its display, much less any form of control. In other words, the CEL Web Page teaches, at best, displaying in response to detecting a word on the Windows Clipboard, yet is silent to “responsive to a user activation of a single control ... displaying,” because detecting a word on the Windows Clipboard does not meet the claim’s “activation of a single control.” The Mandarintools Web Pages are not relied

upon and do not remedy these deficiencies. Hence, the combination fails to teach “responsive to a user activation of a single control ... displaying.”

Thus, the claim comprises features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 25-26 and 30 each depend from and inherit all the limitations of claim 24. As discussed above, claim 24 comprises features and limitations that are outside the scope of the combination of cited art. Thus, claims 25-26 and 30 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

#### **Claims 30-33 and 35-36**

Claims 30-33 and 35-36 comprise features and limitations similar to claims 1-4 and 6-7. As discussed above, claims 1-4 and 6-7 comprise features and limitations that are outside the scope of the combination of cited art. Thus, claims 30-33 and 35-36 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

#### **Claims 38-41 and 43-44**

Claims 38-41 and 43-44 comprise features and limitations similar to claims 9-12 and 14-15. As discussed above, claims 9-12 and 14-15 comprise features and limitations that are outside the scope of the combination of cited art. Thus, claims 38-41 and 43-44 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

#### **Claims 46-49 and 51**

Claims 46-49 and 51 comprise features and limitations similar to claims 17-20 and 22. As discussed above, claims 17-20 and 22 comprise features and limitations that are outside the scope of the combination of cited art. Thus, claims 46-49 and 51 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

**Claims 53-55 and 57**

Claims 30-33 and 35-36 comprise features and limitations similar to claims 1-4 and 6-7. As discussed above, claims 1-4 and 6-7 comprise features and limitations that are outside the scope of the combination of cited art. Thus, claims 30-33 and 35-36 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

**D. Fourth Ground of Rejection**

Claims 5, 12, 20, and 27 under 35 U.S.C. 103(a) over the Mandarintools Web Pages in view of the CEL Web Page and Hughes. Office Action pp. 10-11.

Claims 5, 12, 20, and 27 depend from and inherit all the limitations of one of claims 1, 8, 16, and 23. As discussed above, claims 1, 8, 16, and 23 comprise features and limitations that are outside the scope of the combination of the Mandarintools Web Pages in view of the CEL Web Page. Hughes is not relied upon and does not remedy these deficiencies. Thus, claims 5, 12, 20, and 27 comprise features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

**VIII. Claims Appendix**

A copy of the claims involved in the present appeal is attached hereto as Appendix A. As indicated above, the claims in Appendix A stand as written in the Amendment filed April 9, 2007.

**IX. Evidence Appendix**

No evidence pursuant to §§ 1.130, 1.131, or 1.132 is being submitted.

Evidence entered or relied upon by the Examiner includes:

the Mandarintools Web Pages (three pages) (*available at* <http://web.archive.org/web/20001204034200/http://www.mandarintools.com/cintro.html> and

<http://web.archive.org/web/20001204034200/http://www.mandarintools.com/worddict.html>);

the CEL Web Page (four pages) (*available at* <http://web.archive.org/web/20010309104519/http://home.iprimus.com.au/richwarm/cel/cel.htm>); and

the Foolsworkshop Web Page (one page) (*available at* <http://web.archive.org/web/20021206035901/http://www.foolsworkshop.com/ptou/>).

**X. Related Proceedings Appendix**

No decisions have been made regarding the appeals of the Applications referenced in II above, hence copies of decisions in related proceedings are not provided.

Respectfully submitted,

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## **Appendix A: Claims**

1. A computer implemented method comprising:
  - using a computer having a display and connected to the Internet, copying a Simplified Chinese character into an input field of a graphical user interface;
  - using Unicode to determine a Traditional Chinese character equivalent of the Simplified Chinese character;
  - using Unicode to translate the Simplified Chinese character into an accented Pin Yin word and an English word; and
  - responsive to a user activation of a single control on the graphical user interface, simultaneously displaying the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.
2. The method of claim 1 further comprising: accepting the Simplified Chinese character as user input, wherein the Simplified Chinese character is encoded in GB2312 or Unicode.
3. The method of claim 1 further comprising: translating the Simplified Chinese character from GB2312 to Unicode.
4. The method of claim 1 further comprising: accessing a conversion table to determine the Traditional Chinese character.
5. The method of claim 4 wherein the conversion table is a JAVA hashtable.
6. The method of claim 1 further comprising: accessing a dictionary to determine the accented Pin Yin word and the English word.
7. The method of claim 1 wherein Traditional Chinese character is determined without the use of an intermediate language.

8. Canceled.
  
9. A computer implemented method comprising:
  - using a computer having a display and connected to the Internet, copying a Traditional Chinese character into an input field of a graphical user interface;
  - using Unicode to determine a Simplified Chinese character equivalent of the Traditional Chinese character; and
  - using Unicode to translate the Traditional Chinese character into accented Pin Yin word and an English word;
  - responsive to a user activation of a single control on the graphical user interface, simultaneously displaying the Traditional Chinese character as a Simplified Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.
  
10. The method of claim 9 further comprising: accepting the Traditional Chinese character as user input, wherein the Traditional Chinese character is encoded in Big 5 or Unicode.
  
11. The method of claim 9 further comprising: translating the Traditional Chinese character from Big 5 to Unicode.
  
12. The method of claim 9 further comprising: accessing a conversion table to determine the Simplified Chinese character.
  
13. The method of claim 12 wherein the conversion table is a JAVA hashtable.
  
14. The method of claim 9 further comprising: accessing a dictionary to determine the accented Pin Yin word and the English word.

15. The method of claim 9 wherein Simplified Chinese character is determined without the use of an intermediate language.

16. Canceled.

17. A computer implemented method comprising:  
using a computer having a display and connected to the Internet, entering a Pin Yin word into an input field of a graphical user interface;  
using Unicode to translate the Pin Yin word into a Traditional Chinese character, a Simplified Chinese character, and an English word;  
responsive to a user activation of a single control on the graphical user interface, simultaneously displaying the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.

18. The method of claim 17 wherein the Pin Yin word is an unaccented Pin Yin word or a hybrid Pin Yin word.

19. The method of claim 17 further comprising: accessing a dictionary to determine the Traditional Chinese character and the English word.

20. The method of claim 17 further comprising: accessing a conversion table to determine the Simplified Chinese character.

21. The method of claim 20 wherein the conversion table is a JAVA hashtable.

22. The method of claim 17 wherein Simplified Chinese character is determined without the use of an intermediate language.

23. Canceled.

24. A computer implemented method comprising:

using a computer having a display and connected to the Internet, entering an English word into an input field of a graphical user interface;

using Unicode to translate the English word into a Traditional Chinese character, a Simplified Chinese character, and an accented Pin Yin word;

responsive to a user activation of a single control on the graphical user interface, simultaneously displaying the term as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.

25. The method of claim 24 further comprising: accessing a dictionary to determine the Traditional Chinese character and the accented Pin Yin word.

26. The method of claim 24 further comprising: accessing a conversion table to determine the Simplified Chinese character.

27. The method of claim 26 wherein the conversion table is a JAVA hashtable.

28. The method of claim 24 wherein Simplified Chinese character is determined without the use of an intermediate language.

29. Canceled.

30. A program product operable on a computer, the program product comprising:

a computer-readable medium;

wherein the computer readable medium contains encoded instructions executable on a computer having a display and connected to the Internet comprising:

instructions for receiving a Simplified Chinese character into an input field of a graphical user interface;

instructions for using Unicode to determine a Traditional Chinese character equivalent of a Simplified Chinese character; and

instructions for using Unicode to translate the Simplified Chinese character into accented Pin Yin word and an English word;

instructions for, responsive to a user activation of a single control on the graphical user interface, simultaneously displaying the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.

31. The program product of claim 30 further comprising: instructions for accepting the Simplified Chinese character as user input, wherein the Simplified Chinese character is encoded in GB2312 or Unicode.

32. The program product of claim 30 further comprising: instructions for translating the Simplified Chinese character from GB2312 to Unicode.

33. The program product of claim 30 further comprising: instructions for accessing a conversion table to determine the Traditional Chinese character.

34. The program product of claim 33 wherein the conversion table is a JAVA hashtable.

35. The program product of claim 30 further comprising: instructions for accessing a dictionary to determine the accented Pin Yin word and the English word.

36. The program product of claim 30 wherein Traditional Chinese character is determined without the use of an intermediate language.

37. Canceled.

38. A program product operable on a computer having a display and connected to the Internet, the program product comprising:

a computer-readable medium containing instructions encoded thereon and executable on a computer having a display and connected to the Internet, the instructions comprising:

instructions for receiving a Traditional Chinese character into an input field of a graphical user interface;

instructions for using Unicode to determine a Simplified Chinese character equivalent of the Traditional Chinese character; and

instructions for using Unicode to translate the Traditional Chinese character into an accented Pin Yin word and an English word;

instructions for, responsive to a user activation of a single control on the graphical user interface, simultaneously displaying the Traditional Chinese character as a Simplified Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.

39. The program product of claim 38 further comprising: instructions for accepting the Traditional Chinese character as user input, wherein the Traditional Chinese character is encoded in Big 5 or Unicode.

40. The program product of claim 38 further comprising: instructions for translating the Traditional Chinese character from Big 5 to Unicode.

41. The program product of claim 38 further comprising: instructions for accessing a conversion table to determine the Simplified Chinese character.

42. The program product of claim 41 wherein the conversion table is a JAVA hashtable.

43. The program product of claim 38 further comprising: instructions for accessing a dictionary to determine the accented Pin Yin word and the English word.

44. The program product of claim 38 wherein Simplified Chinese character is determined without the use of an intermediate language.

45. Canceled.

46. A program product operable on a computer, the program product comprising:

a computer-readable medium containing instructions encoded thereon and executable on a computer having a display and connected to the Internet comprising:

instructions for receiving a Pin Yin word in an input field of a graphical user interface;

instructions for using Unicode to translate the Pin Yin word into a Traditional Chinese character, a Simplified Chinese character, and an English word;

responsive to a user activation of a single control on the graphical user interface, simultaneously displaying the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word.

47. The program product of claim 46 wherein the Pin Yin word is an unaccented Pin Yin word or a hybrid Pin Yin word.

48. The program product of claim 46 further comprising: instructions for accessing a dictionary to determine the Traditional Chinese character and the English word.

49. The program product of claim 46 further comprising: instructions for accessing a conversion table to determine the Simplified Chinese character.

50. The program product of claim 49 wherein the conversion table is a JAVA hashtable.

51. The program product of claim 46 wherein Simplified Chinese character is determined without the use of an intermediate language.

52. Canceled.

53. A program product operable on a computer, the program product comprising:
- a computer-readable medium containing instructions encoded thereon and executable on a computer having a display and connected to the Internet comprising:
- instructions for receiving an English word as an input field of a graphical user interface;
- instructions for using Unicode to translate an English word into a Traditional Chinese character, a Simplified Chinese character, and an accented Pin Yin word;
- responsive to a user activation of a single control on the graphical user interface, simultaneously displaying the English word as a Traditional Chinese character, an unaccented Pin Yin word, and a hybrid Pin Yin word.
54. The program product of claim 53 further comprising: instructions for accessing a dictionary to determine the Traditional Chinese character and the accented Pin Yin word.
55. The program product of claim 53 further comprising: instructions for accessing a conversion table to determine the Simplified Chinese character.
56. The program product of claim 55 wherein the conversion table is a JAVA hashtable.
57. The program product of claim 53 wherein Simplified Chinese character is determined without the use of an intermediate language.
58. Canceled.

### **Appendix B: Evidence**

No evidence pursuant to §§ 1.130, 1.131, or 1.132 is being submitted.

Evidence entered and relied upon by the Examiner includes:

the Mandarintools Web Pages (three pages) (*available at*  
<http://web.archive.org/web/20001204034200/http://www.mandarintools.com/cintro.html>

*and*

<http://web.archive.org/web/20001204034200/http://www.mandarintools.com/worddict.html>);

the CEL Web Page (four pages) (*available at*  
<http://web.archive.org/web/20010309104519/http://home.iprimus.com.au/richwarm/cel/cel.htm>); and

the Foolsworkshop Web Page (one page) (*available at*  
<http://web.archive.org/web/20021206035901/http://www.foolsworkshop.com/ptou/>).

## 線上中文工具

### Learn Chinese

- These pages hope to provide tools to assist people in learning and using the beautiful Chinese language. From the novice Chinese language student to the advanced programmer, I hope there is something here for everyone. Rather than being a Chinese language course, it provides tools to people who are already studying and using Chinese. Please check out the [Character Flashcards](#), the [Chinese/English dictionary](#), the [Chinese Namer](#), and the [Western/Chinese Calendar Converter](#). Netscape Communicator 4.7 is the recommended browser for these pages, though they have also been tested on Internet Explorer 3 and above.
- [Chinese Flashcards](#)  
[New, Improved Flashcards](#)  
Study Chinese characters with Java flashcards
  - [Chinese Text Annotator](#)  
Break a text into words and add links to dictionary entries.

### Use Chinese

- [Add Pinyin to Files](#)  
Add pinyin to any Chinese text file on your computer
- [Add Pinyin to Web Pages](#)  
Add pinyin to any Chinese web page!
- [Romanization Converter](#)  
Pinyin, Yale, Gwoyeu Romatzyh, Wade Giles, BoPoMoFo
- [Learn to Draw Chinese Characters](#)  
Links to character writing resources on the Web

### Convert Chinese

- [Character Dictionary](#)  
[Faster Unicode Version](#)  
[Beta Java Version](#)  
Look up Chinese characters by English, pinyin, radian/stroke, and Cantonese.
- [Chinese/English Dictionary](#)  
Look up words in Chinese by pinyin or English
- [Convert HTML Escapes to Bytes](#)  
Convert a Chinese file saved with HTML ampersand escape sequences back into the original encoding.

### Convert Chinese

- [Create Chinese GIFs On-line](#)  
[New Java Version](#)  
Type in Big5, GB, or UTF-8 text and get back an equivalent GIF graphics file
- [Chinese Data Extractor](#)  
Find people names, place names, dates, times, money amounts and more in a Chinese text.
- [Convert Web Documents between GB, Big5, Unicode, etc.](#)  
Type in the web address of a page in any Chinese encoding (traditional or simplified characters) and have it come up in any other encoding.

- [Chinese Encoding Converter](#)  
A Java applet that converts files between GB, GBK, Big5, UTF-8, UCS2, and CNS.

- [Guess Chinese Encoding](#)  
[New Java Version](#)  
Determine the most likely Chinese encoding (GB, HZ, Big5, UTF-8, or other) for a file.
- [Repair Corrupted Chinese E-mails](#)  
Many e-mail programs corrupt Chinese text. Use this program to restore the original.

### Chinese Names

- [Western-Chinese Calendar Converter](#)  
Convert between Solar and Lunar Calendars
- [East Asian Currency Converter](#)  
Convert between US Dollar amounts and 6 East Asian currencies

### Chinese Names

- [Get a Chinese Name](#)  
Get a Chinese name inspired by your English name
- [Chinese Numbers](#)  
Description of Chinese number system and a converter from English numbers to Chinese numbers.

- [Chinese Family Relationships](#)  
Find out how to say "father's older brother's wife" in Chinese

- [On-line Abacus](#)  
Learn how to use the abacus.

### Chinese Utilities

- [Chinese Digit Counter](#)  
A perl script that I wrote to create the counter below.
- [Word97 Chinese Input Macro](#)  
A free macro to input Chinese into Word97 documents without a separate Chinese system.
- [Chinese Encoding Detector](#)  
[Java Version](#)  
Perl5 code to determine the most likely Chinese encoding for a given text string.
- [Chinese Segmenter](#)  
Breaks a Chinese text file into words.
- [HTML Escapes to Byte Converter](#)  
Convert the ampersand escape sequences that many HTML editors save GB and Big5 as back into GB or Big5 (or any other eight-bit encoding).
- [Chinese Input Methods for NT-Emacs](#)  
Precompiled LEIM distribution for Windows Emacs. Unzip in "emacs-20.3.1/lisp/international"

## Chinese Tools Introduction

<http://web.archive.org/web/20010206033905/www.mandarintools.com>

- [Zhuyin Macro](#)  
A Word97 Macro that converts pinyin next to a character into Zhuyin (i.e. BoPoMoFo) or moves the pinyin underneath the character.
- [Java GB/Big5/Unicode Converter](#)  
Stand-alone program to convert text documents between GB, Hz, Big5, Unicode, EUC-TW, etc. Needs Java.
- [Chinese GIF Collection](#)  
Archive of 15,000 character GIFs indexed by their Unicode value.
- [Change Chinese File Names on English Windows](#)  
Windows program that converts file names created on Chinese Windows to an English file name.
- [CEDICT Chinese/English Dictionary](#)  
Freely available Chinese to English dictionary.

Have suggestions for a tool you'd like to see here? Found a bug that needs fixing? You can reach me through my [contact page](#). In your message, please include the type of operating system you are running (Windows 95, Macintosh, Unix, etc.), the browser you are using (Netscape, Navigator, Internet Explorer, etc.), and the browser version (2, 3, 4 or 5).

For general Chinese resources, including information about reading and writing Chinese on computers, please visit my [Chinese Links](#) page or the [frequently asked questions](#) page.

## Other Chinese/Java and Chinese Tools Links

- [Ochlocrat's Learn Mandarin](#)  
page: Several useful applets and applications for making Chinese GIF files, painting Chinese in applications, etc. Also a section using Voice of America Chinese broadcasts to study Mandarin.
- [Hanzi Quiz](#)
- [Cool Flash Animation for learning characters](#)

## Credits and Sources

This page has drawn upon quite a few different public-domain Chinese resources and would not have been possible without them.

- [Ochlocrat's Create Chinese GIF's](#) program. Used by the flashcard and character dictionary.
- [UNIHAN.TXT](#): A marvelous collection of Han character information available at the [Unicode Consortium](#).
- Data files from IFCSS's software data directory.
- [Bell Labs Mandarin Text-to-Speech](#)
- [Frequency of Usage and Number of Strokes of Chinese Characters](#)
- [CEDICT](#): A public-domain Chinese-English dictionary.

You are honored guest number  
——  
to visit this site since October 1, 1996.

Copyright: 1996-2000 by [Erik E. Peterson](#)

## Chinese-English Dictionary

Search  as    
Output as   . Look for  anywhere in dictionary field

If you are willing to host this dictionary, I have made the [necessary files](#) available in a zip file. To set up a mirror, you will need CGI access on your server. If this site is not working, please visit one of the following mirror sites: Mirror Sites:

- [TigerNT Mirror](#)
- [G.Q. Shen's Mirror](#)

This Chinese/English dictionary provides a searchable interface for the [CEDICT dictionary](#) (currently down) put together by Paul Denisowski. Searches can be conducted by Chinese (using either the GB, Big5, or Unicode encodings), pinyin, or English. Results will show the Chinese word, the pinyin representation of the word, and the English definition. You can also click on the pinyin to hear how it is pronounced. A Hong Kong website has published a [review of this dictionary interface](#).

Some points to remember when using this dictionary:

- You can download the dictionary data at the [CEDICT website](#) (currently down), or get my local copy: [GB](#) or [Big5](#) versions.
- This dictionary is only for words. It will not have phrases (such as "I love you") or names. If you want to find out what your name is in Chinese, please use the [Chinese Name Tool](#).
- Pin yin must have spaces between syllables. Tone numbers are not required (but can help). Only Hanyu pinyin works. Wade-Giles and Yale will not work.
- Case is not important.
- The dictionary is not a translator. It will not translate sentences.
- Make sure your query is spelt correctly.
- There is no profanity in the dictionary.

For a off-line way to search the dictionary, please check out the [CEL utility](#) from Richard Warrington.

When searching by Chinese

you can tell the dictionary to find entries that start with the characters, end with the characters, or have the characters anywhere within the final word. You can also ask to only return the Chinese entries that exactly match the word being sought.

When searching by pinyin, you must include a space between the different pinyin syllables. You can include or exclude tone numbers (1-4 and 5 for the neutral tone). For example, if you were looking for the word for television set, you would type "dian shi ji" or "dian1 shi4 ji1" or "dian4 shi1 ji1" (but without the quotes). All would work. But remember to include the space and set the dictionary to look for pinyin, and not Chinese characters or English. As with the Chinese characters, you can direct the dictionary to find entries that have the pinyin at the beginning, end, anywhere, or as the whole entry. You can return the results in GB, Big5 or UTF-8 Unicode.

When searching by English, searches are not case sensitive. Since this is designed as mainly an Chinese to English and not English to Chinese dictionary, if you can't find the word you are looking for, you may be able to find it using a synonym. Also, you may get many unrelated entries than use the word in the English definition but do not give the equivalent Chinese for it. You can return the results in either GB, Big5, or UTF-8 Unicode.

To search by radical/stroke order, please use my [Character Dictionary](#). You can search using a table of radicals and the remaining stroke count of a character. From the list of characters that are returned, you can click on the character to get a list of all words in the dictionary that start with that character. This will only work however if the results are set to be returned as GB, Big5 or Unicode and not as GIFs.

If you encounter problems, please make sure that you are searching by the correct field. For instance, if you are looking by the English word "computer", make sure you are searching by English and not pinyin or characters. If you have any questions or suggestions please visit my [guestbook](#).

If you came to this page directly, please also visit my other [Chinese tools](#).

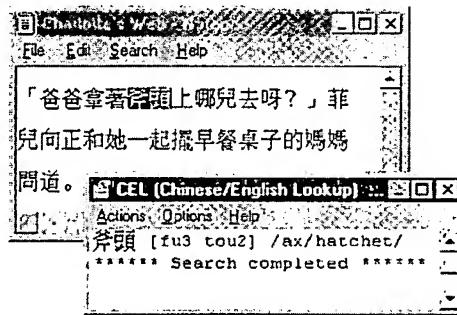
## CEL (Chinese-English Lookup) Software for Windows, Version 2.0

This page last modified Wednesday, February 14, 2001

### What is CEL?

CEL is a Chinese-English dictionary search utility that is designed to help Chinese language learners to read Chinese electronic texts in other applications such as Web browsers and word processors.

In the illustration, the user has selected and copied a word in Notepad. CEL, having detected the word on the Windows Clipboard, has popped up to display the corresponding dictionary entry.



### What's new in Version 2.0 ?

Version 2.0 was released on January 23rd, 1999. Now you can...

- Select dictionary entries and save them to a file for later study or reference
- Choose the Romanisation to be used in displaying dictionary entries (*Pinyin* or *Gwoyeu Romatzyh* ("GR"))
- Choose how the dictionary lookup is triggered (automatically or manually)
- Choose the style of window ("always-on-top" or standard)
- Select the display font

And settings such as the size and position of CEL's window are now recorded for the next time you use CEL.

### What one user said about CEL

I wish I had this program years ago. It's the best thing I've downloaded in months... I am just blown away at how useful it is.

I used to occasionally read Chinese on the internet but I'd end up pawing through my paper dictionary so much that it wasn't very enjoyable. Now I'm just sitting there reading and most of the time CEDICT [the dictionary] has the word, or I can find similar compounds that help me guess, and it's really fast. I'm going to learn a lot

quicker this way.

And the interface couldn't be better, just floating there, automatically responding to the clipboard.

Thank you very very much.

Sincerely,  
Glen Wintringham

### More information about CEL

More detailed answers to the following questions can be found in the CEL documentation file CEL2DOC.TXT (which is included in the download file CEL.ZIP)

#### Do I need Chinese Windows to use CEL?

CEL works best in Chinese Windows, but you can also use it in English-language Windows, provided you use a program that allows you to view Chinese text (such as Twinbridge, RichWin, WinMASS, UnionWay, DynaLab Asia Surf, or NJWin).

#### What dictionary does CEL use?

CEDICT, a public-domain electronic Chinese-English dictionary. (A link to the CEDICT website is in the Download section below.)

#### Does CEL work with both Big5 and GB text?

Yes, but if you want to read GB text there is a workaround you need to know. It's in CEL's documentation.

#### Is CEL freeware?

CEL may be distributed freely but copyright is reserved. CEL has been tested informally but it is not guaranteed to function correctly. The author is not responsible for any consequences of the use of the program.

#### How do I install (and uninstall) CEL?

Create a new directory such as C:\CEL2 and put the first two download files -- CEL2.ZIP and CEDICTB5.ZIP -- in it, then unzip them. (If you need a utility for unzipping you can download an evaluation version of WinZip from <http://web.archive.org/web/20010309104519/http://www.winzip.com/>). Then, if you don't already have VBRUN300.DLL in the System sub-directory of your Windows directory, put VBRUN300.ZIP there and unzip it. Start CEL by running CEL.EXE. You can uninstall CEL by deleting its directory.

### Download CEL

You will need the following files. To install CEL, see the previous paragraph.

- NEW (as of 9th Feb 2001) Version 3-Beta is available [here](#). (The files listed below are for Version 2.)

#### CEL2.ZIP (about 29 KB)

Contains the executable file CEL.EXE (version 2 of CEL), the documentation file CEL2DOC.TXT, the ReadMe file for CEDICT (the dictionary) CEDICT.DOC, and

<http://web.archive.org/web/20010309104519/http://home.iprimus.com.au/richwarrn/cel/ce...> 2/27/2008

another file needed to run CEL, **CMDIALOG.VBX**.  
**CEDICTB5.ZIP** (about 391 KB)

The Chinese-English dictionary, Big5-encoded. Unzips to **CEDICT.B5**. CEDICT is updated from time to time. The version I have here was released on 18th January 2001. The latest Big5 and GB versions of CEDICT are at Erik Peterson's [MandarinTools website](#).

**VBRUN300.ZIP** (about 226 KB)

The Visual Basic 3.0 runtime file. Unzips to **VBRUN300.DLL**. You may well have it already in your Windows directory, or the System sub-directory, in which case you need not download it.

### Important note for users of Internet Explorer, Word, Outlook, etc.

These Microsoft products place copied Chinese text onto the Clipboard in a form that CEL can not interpret. The problem can be fixed by running a utility called **ClipConvert** while you are using CEL. The problem does not arise if you are reading Chinese text in other applications including **Netscape Navigator**, **Notepad**, and **NJStar Chinese Word Processor**.

**ClipConvert** is a freeware utility for Windows 9x and NT 4.x, written by Yves Savourel. See his webpage for **ClipConvert**.

To download **ClipConvert** you will need these two files:

**ClipCovert1.ZIP** (130 Kb)

Contains the executable, on-line help and support for all Windows languages, except Japanese, Chinese and Korean. To install: Create a folder and extract all the files in it.

**ClipCovert2.ZIP** (244 Kb)

Asian codepage tables. Contains support for Japanese, Chinese and Korean. To install: Extract all the files in the folder where ClipConvert.exe is located.

When you fire up **ClipConvert** you can set various options. To use **ClipConvert** with CEL:

- Check the **Auto-convert** option, and
- Set the **Code set** option to **Windows/DOS, Traditional Chinese** if you are using the Big5 version of the dictionary CEDICT, or **Windows/DOS, Simplified Chinese** if you are using the GB version.

I have heard from the author of **ClipConvert** that he is writing a similar utility which doesn't need to be re-configured each time you run it. I'll put a copy of it here when it is released.

### Feedback

If you have questions, comments, suggestions or bug reports, please send them to me (Richard Warmington) at the following address:

**richwarrm AT iprimus.com.au** (but replace AT with @)

CEL (Chinese-English Lookup) software for Windows

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<http://web.archive.org/web/20010309104519/http://home.iprimus.com.au/richwarm/cel/cel...> 2/27/2008

**Pinyin to Unicode**

Special Thanks to James Dew, Helmer Aslaksen, P. Soehlman, and Phyllis Zhang.

This, and more Faculty brought to you by The Fool's Workshop

Many students and instructors of the Chinese language have a need to display pinyin with tone marks in their documents. A number of fonts have been created for PC and Macintosh which allow the easy input of pinyin (for example, Easytone by James Dew). I developed a Macintosh application to convert documents between many of these fonts called Pinyin Font Converter. With the growth of Unicode's popularity and the ease with which users can now display unicode, especially in their browsers, many of us want to produce pinyin with tones in unicode.

This page performs a simple function. It converts text written in pinyin, with syllable-final tone numbers, into unicode. The result is displayed both as plain unicode text and as the HTML code necessary to display the unicode in a web page. Simply enter or paste in the pinyin and convert.

Text to Convert: (For example: zhong1guo2shi4shi4jie4zui4hao3de4guo2jia1, use v for ü)

Thanks to Helmer Aslaksen's excellent [page on Pinyin and Unicode](#) for giving me the codes necessary to make this script. Thanks to James Dew for the Word macro which conveniently listed the order for conversion from which I built both the Pinyin Font Converter and this PHP script. The conversion script itself is free to [download](#), modify, and redistribute under the provisions of the [open source](#) license. Please [e-mail](#) your modified script to me so I may incorporate any improvements.

What if the tones don't display correctly?

You may not have configured your browser to display unicode fonts correctly, or you may not have unicode fonts installed on your system. See Helmer Aslaksen's [web site](#) for information on how to remedy these problems.

This utility and all programs at The Fool's Workshop are free. However, consider giving a donation through PayPal to support hosting and bandwidth costs as well as the further development of free educational software.

[Make a Donation](#)

Last Updated: July 24, 2002

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### **Appendix C: Related Proceedings**

No decisions have been made regarding the appeals of the Applications referenced in II above, hence copies of decisions in related proceedings are not provided.